

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,  
MARISSA BLAIR, APRIL MUNIZ, MARCUS  
MARTIN, NATALIE ROMERO, CHELSEA  
ALVARADO, THOMAS BAKER and JOHN  
DOE,

Plaintiffs,

v.

JASON KESSLER, RICHARD SPENCER,  
CHRISTOPHER CANTWELL, JAMES  
ALEX FIELDS, JR., VANGUARD  
AMERICA, ANDREW ANGLIN,  
MOONBASE HOLDINGS, LLC, ROBERT  
“AZZMADOR” RAY, NATHAN DAMIGO,  
ELLIOT KLINE a/k/a/ ELI MOSELY,  
IDENTITY EVROPA, MATTHEW  
HEIMBACH, MATTHEW PARROTT a/k/a  
DAVID MATTHEW PARROTT,  
TRADITIONALIST WORKER PARTY,  
MICHAEL HILL, MICHAEL TUBBS, LEAGUE  
OF THE SOUTH, JEFF SCHOEP, NATIONAL  
SOCIALIST MOVEMENT, NATIONALIST  
FRONT, AUGUSTUS SOL INVICTUS,  
FRATERNAL ORDER OF THE ALT-  
KNIGHTS, LOYAL WHITE KNIGHTS OF THE  
KU KLUX KLAN, and EAST COAST  
KNIGHTS OF THE KU KLUX KLAN a/k/a  
EAST COAST KNIGHTS OF THE TRUE  
INVISIBLE EMPIRE,

Defendants.

**Civil Action No. 3: 17-cv-00072-NKM**

**PLAINTIFFS’ UNOPPOSED MOTION  
TO EXTEND CERTAIN DISCOVERY DEADLINES**

Plaintiffs respectfully submit this Motion requesting that the Court order the extension of certain discovery deadlines in this Action. Plaintiffs have attempted to confer with all Defendants prior to filing this Motion. All who have responded have consented, which includes counsel for Defendants Matthew Parrott, Traditionalist Worker Party, Jason Kessler, Nathan Damigo, Identity Evropa, Richard Spencer and James Fields. The remaining Defendants have not responded to the revised schedule as agreed to by all other Defendants, and significantly have raised no objection. The revised schedule seeks certain limited extensions and accommodations for logistical difficulties that have arisen during the ongoing pandemic. Accordingly, Plaintiffs hereby respectfully request that the Court amend the following deadlines in the Court's Scheduling Order, ECF No. 597:

1. Opening expert reports shall be submitted by July 20, 2020.
2. Rebuttal expert reports shall be submitted by July 31, 2020.
3. Expert depositions shall be completed by August 7, 2020.
4. Depositions of incarcerated parties and witnesses may be taken after the July 17, 2020 deadline.
5. Depositions of third-party witnesses that a party was unable to subpoena during the discovery period (after making a good-faith effort to do so) may be deposed after the July 17, 2020 deadline.

All other deadlines shall remain the same as stated in the Scheduling Order, ECF No. 597. A proposed order has been submitted herewith.

Dated: June 26, 2020

Respectfully submitted,

/s/ Robert Cahill

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### CERTIFICATE OF SERVICE

I hereby certify that on June 26, 2020, I filed the foregoing with the Clerk of Court through the CM/ECF system, which will send a notice of electronic filing to:

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I further hereby certify that on June 26, 2020, I also served the following non-ECF participants, via electronic mail, as follows:

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